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**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF UTAH, CENTRAL DIVISION**

ALICIA ROHBOCK; RUBY JESSOP; SUSAN
BROADBENT; GINA ROHBOCK; NOLAN
BARLOW; JASON BLACK; MAY MUSSER;
HOLLY BISTLINE; LAWRENCE BARLOW;
STEVEN DOCKSTADER; MARVIN COOKE;
HELEN BARLOW; VERGEL BARLOW;
CAROLE JESSOP; BRIELL LIBERTAE
DECKER f/k/a, LYNETTE WARNER; AMY
NIELSON; SARAH ALLRED; THOMAS
JEFFS; and JANETTA JESSOP,

Plaintiff,

vs.

WARREN STEED JEFFS, et al.,

Defendant.

**DAMAGES DECLARATION
OF HELEN BARLOW**

Case 2:16-cv-00788-TS

Judge G. Ted Stewart

I, Helen Barlow, under criminal penalty under the laws of the State of Utah, and pursuant to Utah Code Ann. § 78B-18a-106, declare as follows:

1. I am over twenty-one years of age.

2. I am a Plaintiff in the above-captioned matter.

3. I make these statements based on my own knowledge and belief.

4. As allowed by the Court, I submit this Damages Declaration to summarize and supplement my proffered and trial testimony on September 27, 2022.

5. I grew up in the FLDS Church and watched Warren Jeffs become the Prophet. He started to assume leadership in the church years earlier when his father became sick, so when his father died, it was natural for him to succeed to that position. For years after his father passed, Jeffs represented that he was the Prophet through his words and actions. I, along with the other faithful FLDS people, wholeheartedly accepted him as the Prophet, relied on his representations, and strove to obey his every command.

6. During those years, Jeffs withheld from us the pieces of the puzzle we needed to understand the wrong and illegal things he was doing. Jeffs played on my sincere belief in him and deprived me of the critical information I needed to discover his fraud. It was very difficult to eventually understand and accept what he had admitted without my knowledge: that he was a false prophet that had been destroying the people. I believe that destruction continues among the FLDS people because of the limited information they have.

7. Based on my fraud claim against Jeffs, I estimate that I suffered damages as summarized in this Damages Declaration.

8. I have been a registered nurse for over 25 years and midwife for about 15 years. I served the FLDS community when it was under Jeffs' control (at least from August 1998) until I left

the community in October 2013. As a nurse midwife, I was on call 24/7 during these years and on average worked more than 40 hour weeks. The most I was ever paid was \$11.75 an hour.

9. From at least the time of Rulon Jeffs' stroke in August 1998 though October 2013 when I lost my income, I was paid significantly less than other nurse midwives with my level of training and experience. I was paid less and did not question it because I relied on Jeffs who controlled Hildale Clinic as the Prophet. I now realize that I should have been compensated at least \$12 more an hour between August 1998 and October 2013. At 40 hours a week, that would conservatively equate to \$378,268 (182 months x 4.33 weeks x 40 hours x \$12).

10. During the ten months from December 2012 to October 2013, I was not paid anything for my services because I was in the United Order and was forced to donate all of my earnings to Jeffs and his program. At \$11.75 an hour I incurred withheld wages amounting to \$20,351 (10 months x 4.33 weeks x 40 hours x \$11.75).

11. In October 2013, after I had questioned Jeffs, I lost favor with him and essentially lost my job because I lost my FLDS patients. As a result, I took work as a nurse and/or midwife in St. George and Hurricane outside the FLDS and have been paid fair compensation.

12. As noted, I was admitted into the United Order in December 2012. This required us to give 100% of our household income to Jeffs in exchange for which we were entitled to food and other necessities from the Bishop's storehouse. As a member of the United Order, we were allowed housing but were not allowed to shop for groceries. What the storehouse could offer was so meager that it was a net loss in terms of the necessities of life that I needed.

13. The housing was provided at a basic level in a communal setting akin to the standard

of living likely experienced by victims of labor trafficking or similar fraud who are required to live with large numbers of people.

14. Nevertheless, I estimate the value of those necessities at \$300 a month over the 182 months from August 1998 through October 2013 when I left to total \$54,600. That total may, at the Court's discretion, be deducted from my economic damages.

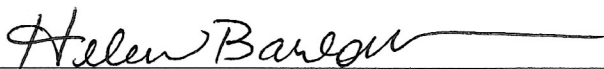
15. Accordingly, my personal withheld wage claim amounts to \$344,019 (\$378,268 + \$20,351 - \$54,600).

16. Based on the evidence received by the Court in relation to my general or non-economic damages, I ask for an award of general damages in the amount of \$1,000,000.

17. I estimate that my total economic and non-economic damages are (\$344,019 + \$1,000,000) for a total of at least \$1,344,019.

18. Finally, I request an award of punitive damages in an amount of equal to my total economic and non-economic damages.

I declare under criminal penalty of perjury in the State of Utah that the foregoing is true and correct to the best of my knowledge and belief.


Helen Barlow